

Robert A. Wampler \*

Tillman C. Carroll

Preston Wilson \*

J. Luke Sanderson

Joseph E. Shanks

Rebecca J. Hutto

D. Alex Stephenson

\*Admitted in Tennessee & Mississippi



**Wampler, Carroll,  
Wilson, & Sanderson, PLLC**

ATTORNEYS AT LAW

PHONE: (901) 523-1857  
Fax: (901) 523-1857  
admin@wcslaw.com

**CONFIDENTIAL COMMUNICATION REGARDING OFFER TO COMPROMISE UNDER FED. R. EVID. 408**

March 28, 2023

TAYLOR INVESTMENTS LLC  
C/O BILL TAYLOR  
1820 NW BROAD ST  
MURFREESBORO, TN 37129-3218

**RE: Settlement Demand  
DAVID JORDAN V. TAYLOR INVESTMENTS LLC**

Dear Sir or Madam:

Enclosed please find a Complaint that I have prepared alleging TAYLOR INVESTMENTS LLC is in violation of the Americans with Disabilities Act (ADA). The allegations contained in the complaint refer to barriers to entry currently present at the Shopping Center located at 1818 NW Broad St, Murfreesboro, TN 37129.

At this juncture, my client is willing to settle this case without filing the Complaint. My client will settle this matter by releasing TAYLOR INVESTMENTS LLC of all known or unknown ADA claims at the subject location which have been or could have been raised as of the date a Settlement Agreement is executed provided that you agree to bring the property into compliance with the ADA and deliver payment to my firm for attorney fees associated with this case.

A Settlement Agreement would propose a deadline for receipt of payment and exchange of executed agreements to occur on or before April 11, 2023. My client is willing for the repair completion period for the subject facility to be 90 days from the date of execution of the Agreement. Based on these terms, you should have the opportunity to take advantage of the tax deduction (up to \$15,000) and tax credit (up to \$5,000) for access related expenditures made in 2023. These incentives are available each fiscal year that you make disability access related expenditures.

Should you not be inclined to resolve this matter, we will be filing the enclosed lawsuit and serving you a copy of the enclosed Rule 34 Notice of Entry Upon Land to conduct a thorough inspection of your property.

I agree not to withdraw this offer to settle for 7 business days. I look forward to hearing back from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca J. Hutto".

Rebecca J. Hutto

Enclosures

**AFF. EXHIBIT "A"**